

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

ANA ROSA OLIVELLA

Plaintiff

VS.

*** CIVIL NO: 98-2267**

*** Credit Collection Damages**

**POPULAR LEASING AND
RENTAL IN., ET ALs**

Defendants

INFORMATIVE MOTION

TO THE HONORABLE COURT:

COMES NOW Plaintiff through the undersigned attorneys and respectfully alleges and prays:

1. Plaintiff respectfully request continuance of discovery proceeding which were cancelled due to dismissal on September 9, 2002. Discovery was to be completed on November 20, 2002. As this Honorable Court recall undersigned was extremely ill due to profuse bleeding and other multiple conditions on or around September 9, 2002. See prior motion requesting to set aside dismissal.

2. Therefore plaintiff needs at least 60 days of additional discovery.

3. In addition to Plaintiff respectfully informs two new experts in this case, namely:

- a. Dr. Carlos A. Cabán Pacheco
Medical Director C.I.P.A.

Calle Lluberas
Edificio Centro Plaza
Santurce, PR
Tel: 721-4020

He replaces Dr. José Fernández Cuevas prior psychiatrist.

4. Dr. Bartolomé Stipec, Economist, who will evaluate the economic damages of plaintiff which have incremented in the past two years. His address is Calle Alelí 135, San Francisco, Río Piedras, PR, with telephone number 759-7484.
5. Therefore, respectfully request said discovery period and also informs said new witness.

RESPECTFULLY REQUEST.

I CERTIFY that on this same date I have filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: David López, Esq., Dagmar A. Adorno Toro, Esq., Pérez Pietri & Díaz Ríos.

In San Juan, Puerto Rico, this August 25, 2004.

s/RAFAEL A. OLIVERAS LOPEZ DE VICTORIA
USDC: 119606
BLDG. ASOCIACION DE MAESTROS
SUITE 605
452 PONCE DE LEON AVE.
SAN JUAN, PUERTO RICO 00918
TEL: (787) 764-3280/FAX: 763-8328